

Lowenstein Sandler LLP

Gavin J. Rooney
Partner

65 Livingston Avenue
Roseland, NJ 07068
T 973 597 2472
F 973 597 2473
grooney@lowenstein.com

November 6, 2015

VIA ECF

The Honorable Cathy L. Waldor, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: In re Thalomid and Revlimid Antitrust Litigation, Civil Action No. 14-6997

Dear Judge Waldor:

Our firm is co-counsel to Defendant Celgene Corporation (“Celgene”) in the above-referenced consolidated matter. Following the Court’s denial of Celgene’s motions to dismiss, Celgene’s Answers to the two Complaints are due on November 13, 2015.

Each of the Complaints is voluminous and complex. The Complaint of Plaintiff International Union of Bricklayers and Allied Craft Workers Local 1 Health Fund (ECF No. 1) contains 316 paragraphs over 74 pages, and the Complaint of Plaintiff City of Providence (No. 15-1605, ECF No. 1) contains 312 paragraphs over 99 pages. In light of the complexity of this matter and the approaching holiday season, Celgene respectfully requests that Your Honor sign and enter the enclosed stipulation and consent order extending Celgene’s time to file Answers to these Complaints for 60 days, to January 11, 2016. The Plaintiffs consent to the proposed extension.

We appreciate the Court’s courtesies in this regard.

Respectfully submitted,

s/ Gavin J. Rooney
Gavin J. Rooney

Enclosure

cc: Honorable Katharine S. Hayden, U.S.D.J. (via ECF)
All Counsel of Record (via ECF)